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March 15, 2019

VIA ECF

Honorable Nicholas G. Garaufis
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Ranieri, et al.*, 18-cr-204 (NGG)(VMS)

Dear Judge Garaufis:

We write on behalf of defendants to address the deadline of today for defense disclosure of expert witnesses. We respectfully request that the Court postpone and address this deadline at the status conference on Monday, as the Court has agreed to do with respect to the other deadlines raised by the government in light of Wednesday's superseding indictment.

As we noted at the February 28 status conference the government's initial expert disclosure was inadequate, and just today the government informed defendants that it does not intend to call Dr. Welner, and has provided the names and CVs of two different experts but without providing more than a sentence of description of what these experts would testify to—weeks after the date the Court had ordered the government to provide expert disclosure. The government's experts should be precluded on the basis of this untimely and inadequate disclosure alone. Defendants further request an opportunity to proffer any of their own experts at a later date given the government's failure to properly disclose its experts and the late-breaking superseding indictment alleging completely new charges less than four weeks before jury selection begins.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar, Mark Lesko (via ECF)
All defense counsel (via ECF)